

1 **JENNY L. FOLEY, Ph.D., ESQ.**

Nevada Bar No. 9017

2 **HKM EMPLOYMENT ATTORNEYS LLP**

1785 E. Sahara Ave, Suite 325

Las Vegas, NV 89104

4 Tel: (702) 625-3893

Fax: (702) 625-3893

5 E-mail: jfoley@hkm.com

Attorney for Plaintiff

6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 CATHERINE FLEMING, An Individual) CASE NO. **2:17-cv-03049-JAD-CWH**

9)
10 Plaintiff,)

11 vs.)

12 CIGNA HEALTHCARE, DOES I-X;)
13 ROE CORPORATIONS I-X.)

ECF NO. 20

14 Defendants.)
15)

16 **STIPULATION AND ORDER TO EXTEND THE TIME TO RESPOND TO**
17 **DEFENDANT'S PARTIAL MOTION TO DISMISS**
(FIRST REQUEST)

18 COMES NOW, the Plaintiff, CATHERINE FLEMING ("Fleming"), by and through
19 her attorney, JENNY L. FOLEY, Ph.D., ESQ., of the law firm HKM EMPLOYMENT
20 ATTORNEYS LLP, and Defendant, CIGNA HEALTHCARE ("CIGNA"), by and through its
21 attorneys, WENDY MEDURA KRINCEK, ESQ., and KAITLYN M. BURKE, ESQ., of
22 LITTLER MENDELSON, P.C., hereby stipulate and agree as follows:
23

24 1. That the Opposition to the Defendant's Partial Motion to Dismiss due on
25 February 8, 2018, may be due on February 22nd, 2018.

26 2. That the Reply to the Opposition to the Defendant's Partial Motion to Dismiss
27 be due on March 8, 2018.
28

1 3. The parties request that the hearing be continued to a date after March 8, 2018,
2 or as soon thereafter as the Court may hear the matter.

3 4. This extension of time is made in good faith and not for purposed of delay. The
4 parties have requested this extension of time due to counsels' respective other pre-existing
5 calendar commitments.
6

7 5. This is the first request for an extension of time in this matter.
8

9 Dated this 7th day of February, 2018.
10 2018.

Dated this 7th day of February,

11 **HKM Employment Attorneys LLP**
12

Littler Mendelson, P.C.

13 /s/ Jenny L. Foley
14 Jenny L. Foley, Ph.D., Esq.
15 Nevada Bar No. 9017
16 1785 East Sahara Ave., Suite 325
Las Vegas, Nevada 89104

/s/ Kaitlyn M. Burke
Wendy Medura Krincek, Esq.
Kaitlyn M. Burke, Esq.
Nevada Bar No. 6417
Nevada Bar No. 13454
3960 Howard Hughes Parkway
Suite 300
Las Vegas, Nevada 89169

17
18
19
20
21
22
23
24 ///

25 ///

26 ///

27 ///

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

IT IS SO ORDERED that the Opposition to the Defendant's Partial Motion to Dismiss shall be due on February 22nd, 2018;

IT IS SO ORDERED that the February 23, 2018, hearing is VACATED and continued to MONDAY, March 12, 2018, at 2 p.m.

Respectfully submitted by:
HKM Employment Attorneys LLP

Page 3 of 3